

# The Campaign

## to Label Genetically Engineered Foods



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Docket Management Branch (HFA-305)  
Docket No. 98N-1038  
Food & Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Dear Food and Drug Administration,

Consumers want and should expect to know when their foods have been processed by irradiation. One of the reasons that FDA determined in their final rule in 1986 that irradiated foods should be labeled was that "irradiation is a form of processing that can produce significant changes in certain characteristics of a food, such as the organoleptic (e.g., taste, smell, texture) or holding properties, in a manner that is not obvious to the consumer in the absence of labeling." Just as the irradiation process caused these changes in 1986, irradiation today still causes these exact same changes. So there is no justification to reduce or minimize the requirement for the Radura symbol and the words "Treated with radiation" or "Treated by irradiation." The Campaign to Label Genetically Engineered Foods is opposed to reducing any labeling requirement from the 1986 Final Ruling. We are also opposed to any future expiration date of labeling requirements.

Further, The Campaign would like to see the labeling requirements expanded to include labeling of foods that contain irradiated ingredients. One of the reasons that food irradiation has not gained in popularity is that consumers are concerned about the change in the structure of foods when irradiated. Not only does irradiation destroy nutrient value, it creates radiolytic products and unique radiolytic products. Although your agency has indicated that these do not pose a threat to human health, consumers are skeptical. And as you should be aware, there are many scientific experts that dispute the safety of irradiated foods. There is not "significant scientific agreement" that irradiated foods are safe for long term consumption. Yes, there are scientists who say irradiation is safe. But there are many scientists from around the world who say that there are genuine reasons for concern.

Therefore, consumers have the right to know if their foods have been irradiated. Any attempt to minimize the requirements for the labeling of irradiation will be opposed by a consumer campaign to get stronger labeling requirements, not less. Further, The Campaign is currently pursuing labeling of genetically engineered foods. Similar legislation of genetically engineered foods has been passed in Europe. The bottom line is that consumers worldwide want foods that are labeled when they are processed by irradiation or altered by genetic engineering. As consumers, we should have the right to know when our foods have been altered by such experimental technologies.

Sincerely,

Craig Winters  
Executive Director

98P-1194

C133

CROSS FILE SHEET

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SEE FILE NO: 98N-1038/C2391